

| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b) | |
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| <p>BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com <i>Proposed Counsel for the Official Committee of Unsecured Creditors</i> -and- GENOVA BURNS LLC. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 230-2095 Fax: (973) 533-1112 Email: DStolz@genovaburns.com DClarke@genovaburns.com GKinoian@genovaburns.com <i>Proposed Local Counsel for the Official Committee of Unsecured Creditors</i></p> | <p>BROWN RUDNICK LLP Stephen D. Palley, Esq. 601 Thirteenth Street, NW Washington, DC 20005 Telephone: (202) 536-1700 Fax: (202) 536-1701 Email: spalley@brownrudnick.com</p> |
| <p>In re:</p> <p>BLOCKFI INC., <i>et al.</i>,</p> <p>Debtors.¹</p> | <p>Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered)</p> <p>Hearing: January 24, 2023 at 10:00 a.m.</p> |

APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF

The applicant, the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors’ service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

“Debtors,” the **“Company,”** or **“BlockFi”**), by and through its proposed counsel, having filed substantially contemporaneously with this Application the *Motion of the Official Committee of Unsecured Creditors to Seal the Redacted Portions of the Committee’s Supplemental Objection to Debtors’ Motion for Entry of an Order (I) Approving the Debtors’ Retention Programs and (II) Granting Related Relief* pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the **“Motion to Seal”**), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the **“Scheduling Order”**), for the reasons set forth below:

1. Substantially contemporaneously with the filing of the Motion to Seal, the Committee filed a redacted version of its supplemental objection (this **“Supplemental Objection”**),² to the Committee’s initial objection filed on January 13, 2023 (the **“Initial Objection”**) [Docket No. 280] to the *Debtors’ Motion for Entry of an Order (I) Approving the Debtors’ Retention Programs and (II) Granting Related Relief* [Docket No. 21-1] (the **“Motion”**)³ filed November 28, 2022. **The return date on the Debtor’s Motion is currently scheduled for January 24, 2023 at 10:00 a.m.**

2. As set forth in the Motion to Seal, the redacted portions of the Supplemental Objection include “trade secret[s] or confidential research, development, or commercial information,” as set forth in Bankruptcy Code Section 107(b) (*see also* Fed. R. Bankr. P. 9018).

² A redacted version of the Supplemental Objection has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the Supplemental Objection is being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](https://www.uscourts.gov/process-to-electronically-request-that-a-document-be-sealed)).

³ Capitalized terms used in this Supplemental Objection but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

The redacted information includes, generally, analysis from Committee professionals based off of data the Debtors' professionals provided during confidential meet and confers with the Committee and their professionals. The Committee committed to protecting this information as confidential in good faith.

3. By this Application, the Committee respectfully requests that, in accordance with this Court's *Process to Electronically Request that a Document be Sealed* ([Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](#)), the hearing on the Motion to Seal be scheduled on the same date and time as the current return date on the Debtor's Motion, which is January 24, 2023 at 10:00 a.m.

4. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

WHEREFORE, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

Dated: January 17, 2023

GENOVA BURNS LLC

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